

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
LORENZO GUARINO,  
Plaintiff,

v.

10246

CIVIL ACTION NO. 04-

R. W. GRANGER & SONS, INC. et al  
Defendants  
\_\_\_\_\_

x

PLAINTIFF'S LIST OF PROPOSED DEPONENTS

Now comes the plaintiff, Lorenzo Guarino, and requests permission to depose the following individuals:

1. Domenic Scavone: Mr. Scavone is a recently added defendant. Permission to conduct his deposition was previously granted, however, the deposition did not go forward.
2. Abdel Elsayabi. Mr. Elsayabi is the president of Fenistration Architectual Products, Inc., an additional recently added defendant.
3. Melissa Hicks. Ms Hicks is or was an employee of Fenistration who was acting as the project manager at the time of the plaintiff's injury. Prior to the plaintiff's accident, Ms. Hicks sent a letter to the defendant Granger addressing unacceptable site conditions.

RESPECTFULLY SUBMITTED,  
PLAINTIFF,  
BY HIS/HER ATTORNEY

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